

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

**IN RE: AQUEOUS FILM-FORMING
FOAMS PRODUCTS LIABILITY
LITIGATION**

MDL No. 2:18-mn-2873-RMG

This Document relates to:

See Cases Listed in Exhibit A Attached Hereto

NAPOLI PLAINTIFFS' MOTION FOR LEAVE TO FILE AMENDED COMPLAINTS

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Leave to File Amended Complaints and accompanying exhibits, Plaintiffs in the cases identified in Exhibit A attached hereto¹ (the "Napoli Plaintiffs") respectfully move this Court for an Order pursuant to Federal Rule of Civil Procedure 15(a)(2) granting them leave to file Amended Complaints that add four new defendants—Carrier Fire & Security, LLC; Carrier Fire & Security Americas, LLC; Carrier Global Corporation; and National Foam, Inc.—and incorporate corresponding allegations identical to the redlined changes in Exhibit B attached hereto.

Counsel for Plaintiffs conferred with Plaintiffs' Co-Lead Counsel prior to the filing of this Motion and obtained their consent. Pursuant to Local Civil Rule 702, Plaintiffs' counsel conferred with counsel for the four new defendants referenced above, as well as Co-Lead Counsel and Co-Liaison Counsel for the Defendants' Coordinating Committee, on the relief requested in this motion. Counsel for the three Carrier entities does not object to the Motion or the relief it seeks. The Defendants' Coordinating Committee also does not oppose the Motion or the relief it seeks,

¹ Plaintiffs in the cases listed in Exhibit A attached hereto are all represented by Napoli Shkolnik in this MDL.

with the caveat that Defendants do not waive any defenses with the proposed amendments, including without limitation defenses based on statutes of limitation or repose. Counsel for National Foam had not responded to Plaintiff's outreach seeking to confer as of the time Plaintiff filed this motion.

PLEASE TAKE FURTHER NOTICE, that pursuant to Local Rule 7.06, opposing affidavits and memoranda of law, if any, must be filed within fourteen days of the filing of this Motion, unless the parties agree otherwise or the Court imposes a different schedule.

Dated: New York, New York
June 7, 2025

Respectfully submitted,

NAPOLI SHKOLNIK

By:/s/ Andrew W. Croner
Andrew Croner, Esq.
Patrick Lanciotti, Esq.
Nicholas Mindicino, Esq.
360 Lexington Avenue, 11th Fl.
New York, New York 10017
(212) 397-1000
acroner@napolilaw.com
planciotti@napolilaw.com
nmindicino@napolilaw.com

Paul J. Napoli, Esq.
Hunter Shkolnik, Esq.
1302 Avenida Ponce de León
Santurce, Puerto Rico 00907
(833) 271-4502
pnapoli@nsprlaw.com
hunter@nsprlaw.com

Counsel for the Napoli Plaintiffs

Approved for filing by Plaintiffs' Lead Counsel:

/s/ Scott Summy

Scott Summy
ssummy@baronbudd.com

/s/ Michael A. London

Michael A. London
mlondon@douglasandlondon.com

/s/ Joseph Rice

Joseph Rice
jrice@motleyrice.com

CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2025, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing upon counsel of record.

/s/ Andrew Croner _____

Andrew Croner, Esq.